

EPA Reg. No. 88781-1
Part. 2

Material Sent for Data Extraction

Reg. # 88781-1

Description: Revised CSF

☐ Material(s) Sent to Data Extraction Contractors:

☐ New Stamped Label Dated _____

☐ Notification Dated _____

☒ New CSF(s) Dated 7/2/13

☐ Other: _____

☐ Decision #: _____

☐ Other Action/Comments: _____

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: S. Hill

Phone: 703-347-8961 Division: ED

Date: 4/29/14

Hill, Shaunta

From: Yanchulis, Michael
Sent: Friday, April 25, 2014 7:46 AM
To: Hill, Shaunta; Schaible, Stephen
Cc: Joyner, Shaja
Subject: RE: Discretionary refund for 88781-1 (R351)

I have entered what I need in OPPIN so you can close out this decision at any time.

Mick

From: Hill, Shaunta
Sent: Thursday, April 24, 2014 3:30 PM
To: Yanchulis, Michael; Schaible, Stephen
Cc: Joyner, Shaja
Subject: RE: Discretionary refund for 88781-1 (R351)

Hi Mick,
Below is the companies, DR request.
Thanks
Shaunta

From: James Wagner [<mailto:jmw@wagnerreg.com>]
Sent: Thursday, April 24, 2014 3:21 PM
To: Hill, Shaunta
Subject: Reg. No. 88781-1 and D-480754

Dear Shaunta,

On behalf of Willowood, I request a discretionary refund of the difference between the original R351 PRIA coding for this decision number and the final coding of R340. The amount of the difference is \$8379. Thank you for your help with this.

Best regards,

Jim Wagner
Agent for Willowood

From: Yanchulis, Michael
Sent: Thursday, April 24, 2014 1:15 PM
To: Schaible, Stephen; Hill, Shaunta
Cc: Joyner, Shaja
Subject: RE: Discretionary refund for 88781-1 (R351)
Whoops, I used FY 14 amounts instead of FY 13 amounts. The refund should be \$8,379.

Mick

From: Yanchulis, Michael
Sent: Thursday, April 24, 2014 12:52 PM
To: Schaible, Stephen; Hill, Shaunta
Cc: Joyner, Shaja
Subject: RE: Discretionary refund for 88781-1 (R351)

Steve,

I am working on refunds tomorrow so send me an email saying that the decision was made to apply a discretionary refund in the amount of \$8,798 (the difference between an R351 and an R340 PRIA action) to the proposed amendment. I will enter the discretionary refund amount in OPPIN ASAP and process the refund tomorrow.

Mick

From: Schaible, Stephen
Sent: Thursday, April 24, 2014 12:27 PM
To: Yanchulis, Michael; Hill, Shaunta
Cc: Joyner, Shaja
Subject: Discretionary refund for 88781-1 (R351)

Hey Mick,

Shaunta and I got a chance to speak with Cynthia about the options on the action below. Rather than recode and have an elapsed PRIA Due Date, the preference is to keep the action at the R351 category and provide a discretionary refund to the registrant that reflects a reduction in expected fee down to the R340 amount.

What do you need from RD to process this refund? FB would like to close out the action (R351 PRIA Due Date approaching) but the DR is supposed to be done prior to the closing of the decision. Shaunta is working with the registrant to get an email requesting the DR, and she will draft a note to file explaining the rationale for the DR.

Thanks! Steve

From: Yanchulis, Michael
Sent: Wednesday, April 23, 2014 11:45 AM
To: Hill, Shaunta; Schaible, Stephen
Cc: Joyner, Shaja
Subject: RE: Discretionary refund possible 88781-1

I have been stuck on the PRIA audit since I returned last Thursday. I will try to get this done this afternoon.

Mick

From: Hill, Shaunta
Sent: Tuesday, April 22, 2014 1:30 PM
To: Schaible, Stephen; Yanchulis, Michael
Cc: Joyner, Shaja
Subject: RE: Discretionary refund possible 88781-1

Hi Mick,
I was wondering if the recoded for the subject product was finalized. I would like to close out the decision.

Thank you
Shaunta

From: Schaible, Stephen
Sent: Wednesday, April 16, 2014 6:39 PM
To: Yanchulis, Michael
Cc: Hill, Shaunta; Joyner, Shaja
Subject: FW: Discretionary refund possible 88781-1

Hi Mick,

Shaunta spoke to me about the decision below. I agree with the PM team's assessment that R340 is the appropriate PRIA category given the requested action (a correction of the source information, not the actual addition of an unregistered source), and that this action should therefore be recoded from the current R351 to R340. There will be an overpayment after the recode.

Thanks! Steve

From: Hill, Shaunta
Sent: Wednesday, April 16, 2014 1:54 PM
To: Schaible, Stephen
Subject: RE: Discretionary refund possible 88781-1

Steve, Just wanted to share the D# for the action to recode from a R351- R340.
Its D# 480754.
Thanks

From: Hill, Shaunta
Sent: Wednesday, April 16, 2014 9:30 AM
To: Schaible, Stephen
Subject: RE: Discretionary refund possible 88781-1

Sure - I'm heading to the room now if the timings okay with you.

From: Schaible, Stephen
Sent: Wednesday, April 16, 2014 9:29 AM
To: Hill, Shaunta
Subject: RE: Discretionary refund possible 88781-1

Should this still be an R351? If it is not actually an unregistered source?

Wanna talk about it in the 21-day room? S

From: Hill, Shaunta
Sent: Wednesday, April 16, 2014 8:22 AM
To: Schaible, Stephen
Subject: Discretionary refund possible 88781-1
Importance: High

Hi Steve,

determined/confirmed
during TRB review.
SA 4/29/14



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

James Wagner
Agent for Willowood Mepiquat Chloride, LLC
Wagner Regulatory Associates, Inc.
P.O. Box 640
7217 Lancaster Pike, Suite A
Hockessin, Delaware 19707

APR 16 2014

Subject: Willowood Mepiquat Chloride Technical
EPA Reg. No. 88781-1
EPA Decision No. 480754

Dear Mr. Wagner

The application referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act as amended is acceptable. The basic confidential statement of formula (CSF) dated 7/2/2013 will be placed in the regulatory file and will supersede all previously accepted CSF's.

If you have any questions, please contact Shaunta Hill by phone at (703) 347-8961 or via email at hill.shaunta@epa.gov.

Sincerely,

A handwritten signature in black ink, which appears to read "Shaja B. Joyner", is written over the typed name.

Shaja B. Joyner
Product Manager 20
Fungicide Branch
Registration Division (7505P)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

FEE

OFFICE OF PESTICIDE PROGRAMS
REGISTRATION DIVISION (7505P)

DATE OUT: 30 / JANUARY / 2014

SUBJECT: **PRODUCT CHEMISTRY REVIEW OF MP [X] EP []**
DP BARCODE No.: DP414197 EPA Reg. No.: 88781-1
PRODUCT NAME: Willowood Mepiquat Chloride Technical
COMPANY: Willowood Mepiquat Chloride, LLC.
FOOD USE [Yes] **INTEGRATED FORMULATION [X]**
PCC: 10910 Decision No. 480754
ACTION CODE: R351 Pesticidal use: Fungicide

FROM: Hari Mukhoty
Product Chemistry Team
Technical Review Branch / RD (7505P)

Handwritten: *Shm 01/30/14*

TO: Shaunta Hill, CRM / William Cutchin, RM 20
Fungicide / RD (7505P)

INTRODUCTION:

The Registrant has submitted an updated basic CSF (dated: 07/02/2013) for a previously registered TGA/MP. The product chemistry data for this product were reviewed and found to be acceptable on 07/12/2012. The registrant is now changing the producer for the aforesaid TGA/MP and has submitted the product chemistry data under MRIDs: 491675-01 and -02.

The technical product is manufactured by [REDACTED] located in [REDACTED]

Proposed label text indicates that this proposed TGA/MP is intended to be formulated into end-use products with food uses. The accepted label (Dated: Aug. 27, 2012) indicated that the product could be used on cotton which indicates that it has food uses e.g., cotton oil.

TRB has been requested to evaluate the product chemistry data submitted for the updated CSF.

SUMMARY OF FINDINGS:

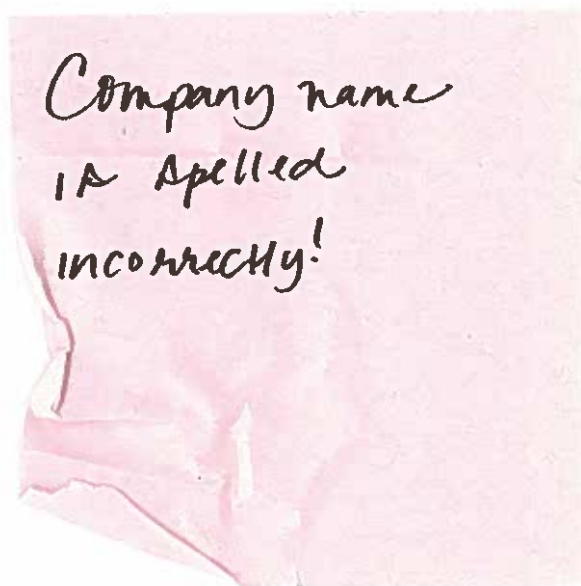
1. The product chemistry data for this Technical product were reviewed three times on 03/15/2012, 07/02/2012 and on 07/12/2012 prior to registration.
2. There were mistakes in Box 2 of all the previously submitted basic CSFs. The producer for this product was always and is currently [REDACTED] as stated in the current CSF 07/02/2013. Willowood Ltd. was not the producer for this product as stated in the previously submitted CSFs (see registrant's letter dated 01/30/2014 enclosed with this review). The five batches analysis data submitted in MRID: 491675-02 is also from the old five batches analysis data conducted by AgroFor Scientific Pty Ltd, located in Australia. These data are not new data and are attached with this review.
3. The overall mean of the active ingredient from the five batch analysis is 98.6% [MRID: 491675-02, Page 6].

DP BARCODE No.: 414197 **EPA Reg.No.:** 88781-1 **PRODUCT NAME:** Willowood Mepiquat Chloride Technical

4. The registrant (Willowed Mepiquat Chloride, LLC) supplied the samples for five batch analysis to the Performing Laboratory and not the producer [MRID: 491675-01]. Previously, in MRID: 486308-01, the producer for Willowood Mepiquat Chloride Technical was identified as the supplier of the test samples which was wrong.
5. The CSF of the proposed TGA/MUP is filled out completely and correctly.

CONCLUSIONS:

1. TRB has reviewed the updated basic CSF (dated: July 2, 2013) for the registered TGA/MP and has found it to be acceptable.
2. The current CSF (dated July 2, 2013) supersedes the previously accepted CSFs (Dated: 03/15/2012, 07/02/2012 and on 07/12/2012).



DP BARCODE No.: 414197 EPA Reg.No.: 88781-1 PRODUCT NAME: Willowood Mepiquat Chloride Technical

CONFIDENTIAL APPENDIX

(Registrant's letter indicating that the producer's name was not correctly stated in the previously submitted and accepted CSFs)

Mukhoty, Hari

From: James Wagner [jmw@wagnerreg.com]
Sent: Thursday, January 30, 2014 1:19 PM
To: Mukhoty, Hari
Subject: Mepiquat chloride technical - EPA Reg No 88781-1
Attachments: EPA DER PChem & Acute Tox.pdf

Dear Hari,

The samples for the 5 batch analysis MRID 48630802 were produced by [REDACTED] in [REDACTED]. This 5 batch report MRID 48630802 incorrectly states the samples were produced by Willowood, Hong Kong. This is a typographical error. The CSF dated October 17, 2011, submitted with the 5 batch report shows the producer in Box 2 as Willowood Ltd., Hong Kong, China. This also is a typographical error in the CSF.

The typographical errors are corrected in the amended 5 batch report MRID 49167502 and in the new CSF dated July 2, 2013 to show the producer as [REDACTED].

To be clear, no production of any kind was done by Willowood Hong Kong, this was a typographical error. The Mepiquat 5 batch samples analyzed for the 5 batch report were produced by [REDACTED] and the Willowood Mepiquat Technical product is produced by [REDACTED]. The purpose of the present submission under review is only to correct this typographical errors contained in the original submission documents submitted in October 2011.

I have attached a copy of the original TRB review of the data.

Best regards,

Jim Wagner
Regulatory Consultant
Tel: 302-635-7290
Mobile: 302-530-5745

Product ingredient source information may be entitled to confidential treatment*

DP BARCODE No.: 414197 **EPA Reg.No.:** 88781-1 **PRODUCT NAME:** Willowood Mepiquat Chloride
Technical

CONFIDENTIAL APPENDIX

[Currently accepted basic CSF with correct name of the producer]

Confidential Statement of Formula may be entitled to confidential treatment

**DP BARCODE No.: 414197 EPA Reg.No.: 88781-1 PRODUCT NAME: Willowood Mepiquat Chloride
Technical**

CONFIDENTIAL APPENDIX

[Previously submitted and accepted CSF with wrong producer's name]

Confidential Statement of Formula may be entitled to confidential treatment

Mukhoty, Hari

From: James Wagner [jmw@wagnerreg.com]
Sent: Thursday, January 30, 2014 1:19 PM
To: Mukhoty, Hari
Subject: Mepiquat chloride technical - EPA Reg No 88781-1
Attachments: EPA DER PChem & Acute Tox.pdf

Dear Hari,

The samples for the 5 batch analysis MRID 48630802 were produced by [REDACTED] in [REDACTED]. This 5 batch report MRID 48630802 incorrectly states the samples were produced by Willowood, Hong Kong. This is a typographical error. The CSF dated October 17, 2011, submitted with the 5 batch report shows the producer in Box 2 as Willowood Ltd., Hong Kong, China. This also is a typographical error in the CSF.

The typographical errors are corrected in the amended 5 batch report MRID 49167502 and in the new CSF dated July 2, 2013 to show the producer as [REDACTED].

To be clear, no production of any kind was done by Willowood Hong Kong, this was a typographical error. The Mepiquat 5 batch samples analyzed for the 5 batch report were produced by [REDACTED] and the Willowood Mepiquat Technical product is produced by [REDACTED]. The purpose of the present submission under review is only to correct this typographical errors contained in the original submission documents submitted in October 2011.

I have attached a copy of the original TRB review of the data.

Best regards,

Jim Wagner
Regulatory Consultant
Tel: 302-635-7290
Mobile: 302-530-5745

Product ingredient source information may be entitled to confidential treatment



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460
OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION
OFFICE OF PESTICIDE PROGRAMS REGISTRATION DIVISION (7505P)

Sub-DP BARCODE No.: D414350; **PARENT BEAN:** D414197; **FILE SYMBOL No.:** 88781-1(screen);
PRODUCT NAME: Willowood Mepiquat Chloride Technical; **DECISION No.:** 480754; **PC Code(s):** 109101;
ACTION CODE: R351; **FOOD Use:** Yes

DATE OUT: August 21, 2013

SUBJECT: Completeness check screening for Willowood Mepiquat Chloride technical

FROM: Shyam Mathur,
Product Chemistry Team Leader
Technical Review Branch/RD (7505P)

S Mathur
8/22/13

TO: Shaunta Hill / Shaja Joyner, RM Team 21
Fungicide Branch / RD (7505P)

Company Name: Willowood Mepiquat Chloride, LLC
Formulation Type: Fungicide
Active Ingredient(s): Mepiquat Chloride (98.6%)
Results of completeness check screen

File No./ Reg. No	Product Name	Group A Data Submitted		Group B Data Submitted		CSF		Label
		Yes	No	Yes	No	Yes	No	
88781-1	Willowood Mepiquat Chloride	830.1620 830.1700						

CONCLUSION:

Group A: The data submitted for the Guidelines 830.17000 (preliminary analysis) has been submitted.

The amended data for the guideline 830.1620 (description of manufacturing process) has been submitted which involved the correction of name of production facility and clarifying the source of the test samples used to conduct 5 batch analysis.

CSF: Basic CSF (dated 7-02-13) submitted.

MRID No. 491675-02 (5 batch analysis)

MRID No. 491675-01 (description of manufacturing process) amendment to MRID No.486308-01 (original data)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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OFFICE OF PESTICIDE PROGRAMS REGISTRATION DIVISION (7505P)

Sub-DP BARCODE No.: D414350; **PARENT BEAN:** D414197; **FILE SYMBOL No.:** 88781-1(screen);
PRODUCT NAME: Willowood Mepiquat Chloride Technical; **DECISION No.:** 480754; **PC Code(s):** 109101;
ACTION CODE: R351; **FOOD Use:** Yes

DATE OUT: August 21, 2013

SUBJECT: Completeness check screening for Willowood Mepiquat Chloride technical

FROM: Shyam Mathur,
Product Chemistry Team Leader
Technical Review Branch/RD (7505P)

TO: Shaunta Hill / Shaja Joyner, RM Team 21
Fungicide Branch / RD (7505P)

Company Name: Willowood Mepiquat Chloride, LLC
Formulation Type: Fungicide
Active Ingredient(s): Mepiquat Chloride (98.6%)
Results of completeness check screen

File No./ Reg. No	Product Name	Group A Data Submitted		Group B Data Submitted		CSF		Label
		Yes	No	Yes	No	Yes	No	
88781-1	Willowood Mepiquat Chloride	830.1620 830.1700						

CONCLUSION:

Group A: The data submitted for the Guidelines 830.17000 (preliminary analysis) has been submitted.

The amended data for the guideline 830.1620 (description of manufacturing process) has been submitted which involved the correction of name of production facility and clarifying the source of the test samples used to conduct 5 batch analysis.

CSF: Basic CSF (dated 7-02-13) submitted.

MRID No. 491675-02 (5 batch analysis)

MRID No. 491675-01 (description of manufacturing process) amendment to MRID No.486308-01 (original data)

Hill, Shaunta

From: Hill, Shaunta
Sent: Monday, August 19, 2013 3:05 PM
To: 'james@wagnerreg.com'
Subject: 88781-1: Decision # 480754: Application deficiency - data matrix

88781-1

Willowood Mepiquat Chloride Technical

Hello Mr. Wagner,

In reviewing your application dated 7/2/13, I noticed that the enclosed data matrix does not include the MRIDs for the amended study reports submitted with your application. Please revise your data matrix to include the additional MRIDs for guidelines 830.1620 and 830.1700/1800. Once the MRIDs are incorporated, please submit the revised form to the Agency. If you prefer to email the revised data matrix, you may send it directly to me by reply of this email.

If you have any questions, please let me know.

Thank you.

Regards,

Shaunta Hill, Ph. D
U.S. EPA :Office of Chemical Safety and Pollution Prevention
Registration Division/Fungicide Branch
1200 Pennsylvania Avenue, NW (7504P)
Washington, DC 20460

Tel: 703.347.8961 | Fax: 703.305.6920

E-mail: hill.shaunta@epa.gov

URL Address: www.epa.gov/pesticides

AMENDMENT

21-Day Screen Completed by
Contractor

21-Day Expires on 7-29-13

Jacket # 88781-1

MRID# 491675

Content Screen: Recommend to Pass/Fail

11-3 Review: Pass/Fail/NA

Overall Status: Recommend to Pass/Fail

Transfer This Jacket to:

STEPHEN SCHAIK

PRIA 3 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

21 Day Screen Start Date: 7-8-13 September 2012

Experts In-Processing Signature: B.B. Date 7-11-13 Fee Paid: Yes ☒

Division management contacted on issues No ☐ Yes ☐ Date _____

EPA Reg. Number: <u>88781-1</u>		EPA Receipt Date: <u>7-8-13</u>								
Items for Review				Yes	No	N/A*				
1	Application Form (<u>EPA Form 8570-1</u>) signed & complete including package type			<input checked="" type="checkbox"/>						
2	Confidential Statement of Formula all boxes completed, form signed, and dated (<u>EPA Form 8570-4</u>)			<input checked="" type="checkbox"/>						
	a) All <u>inerts</u> , including fragrances, approved for the proposed uses (see Footnote A)		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: center;">yes</td> <td style="text-align: center;">no</td> </tr> <tr> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td></td> </tr> </table>	yes	no	<input checked="" type="checkbox"/>				
yes	no									
<input checked="" type="checkbox"/>										
3	Certification with Respect to Citation of Data (<u>EPA Form 8570-34</u>) completed and signed (N/A if 100% repack)			<input checked="" type="checkbox"/>						
	Certificate and data matrix consistent			<input checked="" type="checkbox"/>						
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: center;">yes</td> <td style="text-align: center;">no</td> </tr> <tr> <td></td> <td></td> </tr> </table>	yes	no					
yes	no									
	If applicable, is there a letter of Authorization for exclusive use only.									
4	Formulator's Exemption Statement (<u>EPA Form 8570-27</u>) completed and signed (N/A if source is unregistered or applicant owns the technical)					<input checked="" type="checkbox"/>				
	Data Matrix (<u>EPA Form 8570-35</u>) both internal and external copies (<u>PR 98-5</u>) completed and signed (N/A if 100% repack)			<input checked="" type="checkbox"/>						
5	a) Selective Method (Fee category experts use)		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: center;">yes</td> <td style="text-align: center;">no</td> </tr> <tr> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td></td> </tr> </table>	yes	no	<input checked="" type="checkbox"/>				
yes	no									
<input checked="" type="checkbox"/>										
	b) Cite-All (Fee category experts use)									
	c) Applicant owns all data (Fee category experts use)									
6	5 Copies of <u>Label</u> (<u>Electronic labels on CD</u> are encouraged and guidance is available)				<input checked="" type="checkbox"/>					
7	Is the data package consistent with <u>PR Notice 86-5</u>			<input checked="" type="checkbox"/>						
8	Notice of Filing included with <u>petitions</u>					<input checked="" type="checkbox"/>				

9	If applicable for conventional applications, <u>reduced risk rationale</u>				X
	<u>Required Data</u> and/or data waivers. See Footnote C.				
10	a) List study (or studies) not included with application				

Comments:

- Studies associated passed PRN 11-03 review.
- Technical and impurities only, no insets to review.

PRN 11-03 review - Passed
Amendment - Passed
(CSF)

J.S

MRID-491675

* N/A – Not Applicable

Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses or have an application pending with the Agency. If an unapproved inert with no application pending with the Agency is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are **strongly encouraged** to verify that all inert ingredients have been approved for the application's uses or have an application pending with the Agency **even if a product is currently registered** by consulting the [inert Web site](#) and if the inert is not approved nor has an application pending with the Agency, to **obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient**. Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at inertsbranch@epa.gov and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the [Chief of Microbial Pesticides Branch](#).

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

Unapproved Inerts Identified on CSFs

All applications except conventional new products and PIPs

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Provide the required information necessary to identify an inert approval application that is pending with the Agency; or
3. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;
4. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

Conventional New Product Applications

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R300 or R301), it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.
3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.

C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.

Payment Still Due

Please complete the 21-day review and forward to the appropriate regulatory division.

Regulatory divisions, please check with Mick Yanchulis (347-0237) to ensure full payment has been made before beginning any substantive work on this action.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

July 10, 2013

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

PLEASE RETURN A COPY OF THIS LETTER WITH PAYMENT
OR PAY ON-LINE at www.Pay.Gov (See Below for Details)

OPP Decision Number: D-480754
EPA File Symbol or Registration Number: 88781-1
Product Name: WILLOWOOD MEPIQUAT CHLORIDE TECHNICAL
EPA Receipt Date: 08-Jul-2013
EPA Company Number: 88781
Company Name: WILLOWOOD MEPIQUAT CHLORIDE, LLC

JAMES WAGNER
WAGNER REGULATORY ASSOCIATES, INC
WILLOWOOD MEPIQUAT CHLORIDE, LLC
PO Box 640
HOCKESSIN, DE 19707-

SUBJECT: Receipt of Amendment Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application for Amendment. If you submitted data with this application, the results of the PRN-2011-3 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

This action has been identified as action code R351:
AMENDMENT;UNREGISTERED SOURCE OF ACTIVE INGREDIENT;

Please note that a discretionary refund request has been noted with your application; however a decision on the amount of the discretionary refund, if any, will not be determined until this action is completed. Therefore, please remit payment in the amount of \$8,379 (fee for action code R351 is \$11,996 minus payment of \$3,617) within 14 days to:

By USPS:
USEPA Washington Finance Center
Pesticide Registration Service Fee
PO Box 979074
St. Louis, MO 63197

Fee for Service

{9379780~

This package includes the following

☐ New Registration

☒ Amendment

☒ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: ____

for Division

☐ AD

☐ BPPD

☒ RD

Risk Mgr.

20

Receipt No.

S-

937978

EPA File Symbol/Reg. No.

88781-1

Pin-Punch Date:

7/8/2013

☐ This item is NOT subject to FFS action.

Action Code:

Requested:

R340

Granted:

R351

Amount Due: \$

11996.00

Parent/Child Decisions:

Technical & Impurities only, no inerts to review. 7-22-13/JS

☒ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: JPH

Date: 7/9/13

Remarks:

~ Based on cover letter, may be eligible for discretionary refund

Receipt for Section 3

S: 937978

Resubmission: ☐ Yes ☒ No

Regulatory Type: Product Registration - Section 3

Fee For Service: ☐ Yes ☒ No

Application Type: Amendment

Billable: ☒ Yes ☐ No

Company: 88781 WILLOWOOD MEPIQUAT CHLORIDE, LLC V

Risk Manager: Registration Division, Risk Management Team 20

Product #: 88781-1 Product Name: WILLOWOOD MEPIQUAT CHLORIDE TECHNIC

Override#:

Me Too Section3: 42750-73 Me Too Product Name: TECHNICAL MEPIQUAT CHLORIDE

Application Date: 02-Jul-2013

OPP Rec'd Date: 08-Jul-2013

Front End Date: 08-Jul-2013

Risk Manager Send Date:

FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

Amendment to correctly identify the name of the product manufacturer

Form A: ☐ Signature Date:

Form B: ☐ Signature Date:

New Ingredient Request Date:

New Ingredient Received Date:

Print Letter

Enter More Information

Tracking

Receipt Content

Des

Study

CSF

View/Edit



United States
Environmental Protection Agency
 Washington, DC 20460

Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 88781-1	2. EPA Product Manager Driss Benmhend	3. Proposed Classification <input checked="" type="checkbox"/> None Restricted
4. Company/Product (Name) Willowood Mepiquat Chloride, LLC/ Willowood Mepiquat Chloride Technical	PM# 20	
5. Name and Address of Applicant (Include Zip Code) Willowood Mepiquat Chloride, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to:

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Amendment to correctly identify the name of the product manufacturer.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
* Certification must be submitted		If "Yes" No. per container	If "Yes" No. per container	<input checked="" type="checkbox"/> Plastic	
		Unit Packaging wgt.	Package wgt.	<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) HDPE lined bags	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 500 kg (1102 lbs)		5. Location of Label Directions <input type="checkbox"/> On Label <input checked="" type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product		<input type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name James M Wagner		Title Agent for Willowood Mepiquat Chloride, LLC		Telephone No. (Include Area Code) (302) 635-7283	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title Agent for Willowood Mepiquat Chloride, LLC			
4. Typed Name James M Wagner		5. Date July 2, 2013			

Federal Express

July 3, 2013

Document Processing Desk (REGFEE)
ATTN: Acting PM 20, Fungicide Branch
Registration Division, US EPA
Office of Pesticide Programs (7504P)
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202-4501



Dear Sir or Madam,

Subject: Willowood Mepiquat Chloride Technical, EPA Reg. No. 88781-1

On behalf of Willowood Mepiquat Chloride, LLC, I am submitting the enclosed application to amend the registration of Willowood Mepiquat Chloride Technical, EPA Reg. No. 88781-1.

Background for this application is as follows.

1. In the original 5 batch report (MRID 48630802) for this product registration, it states that the samples were supplied by Willowood (Hangzhou) Co. Ltd. This company was shown in the CSF dated October 17, 2011 in box 2 as the 'producer'.
2. Subsequently, it became clear that while Willowood Co. Ltd. supplied the samples to the laboratory, Willowood had not manufactured the samples. Therefore we submitted a request on March 13, 2013 to amend the CSF dated October 17, 2011 to change the information in Boxes 2 and 11 of the form.
3. In response we received a letter dated April 12, 2013, from Mr. Benmhend which rejected the submission and asked that the request be resubmitted as a PRIA application. A copy of our letter of March 13th and Mr. Benmhend's letter of April 12th are enclosed.

Accordingly, I am now resubmitting a request to amend the CSF for this product to change the company name in boxes 2 and 11 of the form. No other changes, except for the date, have been made to the CSF. To support this request I am submitting an amended preliminary analysis (5 batch) report for this product. The performing laboratory has amended the original report to show the name and address of manufacturer of the test samples rather than the name and address of company supplying the samples. I am also submitting an amendment to the report of the manufacturing process (MRID No. 48630801) with the same change as the 5 batch report, i.e. the name and address of the manufacturer replaces the name and address of the supplier.

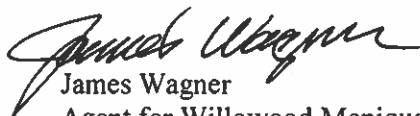
The only change to the preliminary analysis report is with regard to the manufacturer of the test substance, as shown on pages 6 and 89 of the amended report. There are no changes in the analytical data or any other information from the original report. Therefore the Agency's technical reviews (attached) dated 6/28/12 and 7/10/12 for the original report are unaffected by this report amendment and further technical review of the report data is unnecessary. We therefore believe that this action qualifies as PRIA category R340 and the fee for this category has been paid and receipt attached.

To support of this amendment, the following documents are enclosed:

- Letter from Willowood Mepiquat Chloride, LLC appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Registration (8570-1)
- Confidential Statement of Formula (8570-4), 2 copies
- Data matrix, EPA form 8570-35
- Certification form 8570-34
- Receipt of payment of PRIA fee category R340
- WRA letter dated March 13, 2013
- EPA letter dated April 12, 2013
- A copy of the last EPA approved CSF dated October 17, 2011
- EPA product chemistry reviews for 88781-1, dated June 28 and July 10, 2012
- Supporting data (3 copies each)

If you have any questions about this submission please contact the undersigned at james@wagnerreg.com or (302) 635-7290.

Respectfully submitted,



James Wagner
Agent for Willowood Mepiquat Chloride, LLC

Enclosures

DATA TRANSMITTAL DOCUMENT

1. Name and Address of Submitter

Willowood Mepiquat Chloride, LLC
c/o Wagner Regulatory Associates
PO Box 640
Hockessin, DE 19707

2. Regulatory Action In Support Of Which This Package Is Submitted

Application for Amendment to Registration
Willowood Mepiquat Chloride Technical
EPA Reg. No. 88781-1

3. Transmittal Date

July 3, 2013

4. List of Submitted Studies

Wagner Regulatory Associates, Inc. (2013) Amendment to MRID 48630801:
Willowood Mepiquat Chloride Technical- Description of Manufacturing Process. Non-
confidential portion 5 pages, Confidential portion 3 pages.

Skopec, Jana (2013) Amendment to MRID 48630802: Preliminary Analyses of Five
Representative Production Batches of Mepiquat Chloride Technical Grade Active
Ingredient (TGAI) to Determine Percent Mepiquat Chloride and to Quantify its
Associated Impurities. AgriFor Scientific Pty Ltd., North Ryde, Australia. Report
Number WW-035 (Amended). Non-confidential portion 5 pages, Confidential portion
93 pages.

Company Official and Contact:

James M Wagner, Authorized Agent
Name and Title


Signature

Telephone: (302) 635-7290

Online Payment

Step 3: Confirm Payment

1 | 2 | 3

Thank you.

Your transaction has been successfully completed.

Pay.gov Tracking Information

Application Name: PRIA Service Fees

Pay.gov Tracking ID: 25BE33KF

Agency Tracking ID: 74472066705

Transaction Date and Time: 07/03/2013 14:18 EDT

Payment Summary

Address Information

Account Holder

Name: Brian Heinze

Billing Address: 1600 NW Garden
Valley Blvd

Billing Address

2:

City: Roseburg

State / Province: OR

Zip / Postal Code: 97471

Country: USA

Account Information

Card Type: Master Card

Card Number: *****3411

Decision Number:

Registration Number: 88781-1

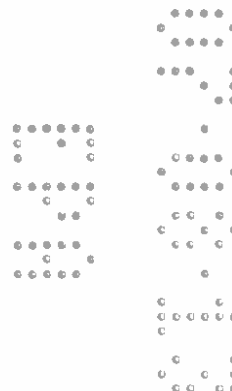
Company Name: Willowood
Mepiquat LLC

Company Number: 88781

Action Code: R340

Payment Information

Payment Amount: \$3,617.00

Transaction Date 07/03/2013
and Time: 14:18 EDT

Willowood Mepiquat Chloride, LLC

August 24, 2011

To: Whom it May Concern

Re: Designation of Agent for:
Willowood Mepiquat Chloride, LLC
1600 NW Garden Valley Blvd.
Suite 120
Roseburg, OR 97471

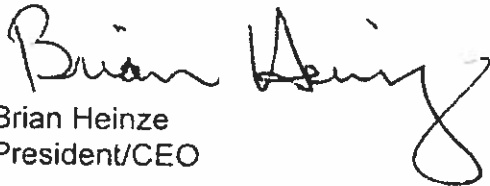
Dear Sir or Madam:

This letter serves as notification that Willowood Mepiquat Chloride, LLC has appointed Wagner Regulatory Associates, Inc. (WRA, Inc.) to serve as the Agent on our company's behalf regarding all state and federal regulatory matters relative to its Mepiquat Chloride products that Willowood Mepiquat Chloride, LLC will register with US EPA and the states. Please forward all correspondence for Willowood Mepiquat Chloride, LLC and its products to:

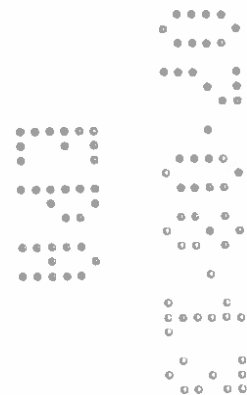
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707-0640

Thank you for your time and assistance. Please feel free to call me at if you have any questions.

Respectfully submitted,


Brian Heinze
President/CEO

cc: WRA, Inc.



1600 NW Garden Valley Blvd., Suite 120 | Roseburg, Oregon 97471



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

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Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Willowood Mepiquat Chloride, LLC, c/o P.O. Box 640, Hockessin, DE 19707	EPA Registration Number/File Symbol 88781-1
Active Ingredient(s) and/or representative test compound(s) Mepiquat chloride	Date July 2, 2013
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial Food and Terrestrial Non-food	Product Name Willowood Mepiquat Chloride Technical

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature 	Date July 2, 2013	Typed or Printed Name and Title James Wagner, Authorized agent
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.

WASHINGTON, D.C. 20460

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DATA MATRIX

Date: July 2, 2013	EPA Reg No./ File Symbol: 88781-1	Page 1 of 4
Applicant's/Registrant's Name and Address: Willowood Mepiquat Chloride, LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707	Product: Willowood Mepiquat Chloride Technical	
Ingredient: Mepiquat Chloride		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
PRODUCT SPECIFIC					
830.1550, 830.1600, 830.1620, 830.1650, 830.1670,	Product identity & Composition/Description of Materials Used to Produce the Product/Description of Production & Formulation Process/Discussion of Formation of Impurities	48630801 48821301	Willowood Mepiquat Chloride, LLC	Own	
830.1700	Preliminary Analysis	48630802	Willowood Mepiquat Chloride, LLC	Own	
830.1750	Certification of Limits	48630802	Willowood Mepiquat Chloride, LLC	Own	1
830.1800	Enforcement Analytical Method	48630803	Willowood Mepiquat Chloride, LLC	Own	
830.6302	Color	48630803	Willowood Mepiquat Chloride, LLC	Own	
830.6303	Physical State	48630803	Willowood Mepiquat Chloride, LLC	Own	
830.6304	Odor	48630803	Willowood Mepiquat Chloride, LLC	Own	
830.6313	Stability to Normal & Elevated Temperatures	48630803	Willowood Mepiquat Chloride, LLC	Own	
830.6314	Oxidation/Reduction	48630803	Willowood Mepiquat Chloride, LLC	Own	
830.6315	Flammability	48630803	Willowood Mepiquat Chloride, LLC	Own	
830.6316	Explosibility	48630803	Willowood Mepiquat Chloride, LLC	Own	
830.6317	Accelerated Storage Stability	48630803	Willowood Mepiquat Chloride, LLC	Own	
830.6319	Miscibility	48630803	Willowood Mepiquat Chloride, LLC	Own	
830.6320	Corrosion Characteristics	48976001	Willowood Mepiquat Chloride, LLC	Own	
830.6321	Dielectric Breakdown Voltage	48630803	Willowood Mepiquat Chloride, LLC	Own	
830.7000	pH	48630803	Willowood Mepiquat Chloride, LLC	Own	
830.7050	UV/Visible Light Absorption	48630803	Willowood Mepiquat Chloride, LLC	Own	
830.7100	Viscosity	48630803	Willowood Mepiquat Chloride, LLC	Own	
830.7200	Melting Point	48630803	Willowood Mepiquat Chloride, LLC	Own	

Signature: 	Name and Title James M Wagner Agent for Willowood Mepiquat Chloride, LLC	Date July 2, 2013
--	--	----------------------



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.

WASHINGTON, D.C. 20460

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DATA MATRIX

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Applicant's/Registrant's Name and Address: Willowood Mepiquat Chloride, LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707	Product: Willowood Mepiquat Chloride Technical	
Ingredient: Mepiquat Chloride		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7220	Boiling Point	48630803	Willowood Mepiquat Chloride, LLC	Own	
830.7300	Relative Density	48630803	Willowood Mepiquat Chloride, LLC	Own	
830.7370	Dissociation Constants in Water	48630803	Willowood Mepiquat Chloride, LLC	Own	
830.7520	Particle Size, Fiber Length, and Diameter Distribution	48630803	Willowood Mepiquat Chloride, LLC	Own	
830.7550, 7560, 7570	Octanol/Water Partition Coefficient	48630803	Willowood Mepiquat Chloride, LLC	Own	
830.7840, 7860	Water Solubility	48630803	Willowood Mepiquat Chloride, LLC	Own	
830.7950	Vapor Pressure	48630803	Willowood Mepiquat Chloride, LLC	Own	
870.1100, 870.1200, 870.1300, 870.2400, 870.2500, 870.2600 Generic Data	Acute Oral Toxicity, Acute Dermal Toxicity, Acute Inhalation Toxicity, Primary Eye Irritation, Primary Dermal Irritation, Skin Sensitization Generic Data	Cite All	Bayer CropScience LP Research Triangle Park, NC Aceto Agricultural Chemicals Corp. Lake Success, NY BASF Corporation Research Triangle Park, NC Loveland Products, Inc. Greeley, CO Albaugh Inc., Ankeny, IA Nufarm USA, Inc. Research Triangle Park, NC Arysta LifeScience North America, LLC, Cary, NC	Pay	

Signature

Name and Title
James M Wagner
Agent for Willowood Mepiquat Chloride, LLC

Date
July 2, 2013



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.

WASHINGTON, D.C. 20460

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DATA MATRIX

Date: July 2, 2013	EPA Reg No./ File Symbol: 88781-1	Page 3 of 4
Applicant's/Registrant's Name and Address: Willowood Mepiquat Chloride, LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707	Product: Willowood Mepiquat Chloride Technical	
Ingredient: Mepiquat Chloride		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Spray Drift Task Force Washington, DC		
			Gowan Pacific Group, LLC Yuma, AZ		
			Outdoor Residential Exposure Task Force, Washington, DC		
			Agricultural Reentry Task Force Washington, DC		
			Integrated Farming, Inc., Raleigh, NC		
			FIFRA Endangered Species Task Force Washington, DC		
			The Hide Group, Inc. Sardis, MS		
			Agricultural Handlers Exposure Task Force, Macon, MO		
			Gro-Pro, LLC Gig Harbor, WA		
			U.S.A. Ag Chemicals, Inc. Washington, DC		
			Tacoma Ag, LLC Brookfield, CT		

Signature

Name and Title

James M Wagner

Agent for Willowood Mepiquat Chloride, LLC

Date

July 2, 2013



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Form Approved OMB No. 2070-0060

401 M Street, S.W.

WASHINGTON, D.C. 20460

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DATA MATRIX

Date: July 2, 2013	EPA Reg No./ File Symbol: 88781-1	Page 4 of 4
Applicant's/Registrant's Name and Address: Willowood Mepiquat Chloride, LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707	Product: Willowood Mepiquat Chloride Technical	
Ingredient: Mepiquat Chloride		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Agsaver, LLC Washington, DC		
			Generic Endangered Species Task Force, Gig Harbor, WA		

Footnotes: 1) Certification of Limits is provided in the Confidential Statement of Formula EPA form 8574-4

003

07-00-20

Signature

Name and Title
James M Wagner
Agent for Willowood Mepiquat Chloride, LLC

Date
July 2, 2013



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.

WASHINGTON, D.C. 20460

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DATA MATRIX

Date: July 2, 2013	EPA Reg No./ File Symbol: 88781-1	Page 2 of 4
Applicant's/Registrant's Name and Address: Willowood Mepiquat Chloride, LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707	Product: Willowood Mepiquat Chloride Technical	
Ingredient: Mepiquat Chloride		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Willowood Mepiquat Chloride, LLC	Own	
			Willowood Mepiquat Chloride, LLC	Own	
			Willowood Mepiquat Chloride, LLC	Own	
			Willowood Mepiquat Chloride, LLC	Own	
			Willowood Mepiquat Chloride, LLC	Own	
			Willowood Mepiquat Chloride, LLC	Own	
			Willowood Mepiquat Chloride, LLC	Own	
			Bayer CropScience LP Research Triangle Park, NC	Pay	
			Aceto Agricultural Chemicals Corp. Lake Success, NY		
			BASF Corporation Research Triangle Park, NC		
			Loveland Products, Inc. Greeley, CO		
			Albaugh Inc., Ankeny, IA		
			Nufarm USA, Inc. Research Triangle Park, NC		
			Arysta LifeScience North America, LLC, Cary, NC		

Signature

Name and Title

James M Wagner

Agent for Willowood Mepiquat Chloride, LLC

Date

July 2, 2013



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Form Approved OMB No. 2070-0060

401 M Street, S.W.

WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instruction and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington DC 20460. Do not send the form to this address.

DATA MATRIX

Date: July 2, 2013

EPA Reg No./ File Symbol: 88781-1

Page 3 of 4

Applicant's/Registrant's Name and Address: Willowood Mepiquat Chloride, LLC
c/o Wagner Regulatory Associates Inc.
P.O. Box 640
Hockessin, DE 19707

Product:
Willowood Mepiquat Chloride Technical

Ingredient: Mepiquat Chloride

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Spray Drift Task Force Washington, DC		
			Gowan Pacific Group, LLC Yuma, AZ		
			Outdoor Residential Exposure Task Force, Washington, DC		
			Agricultural Reentry Task Force Washington, DC		
			Integrated Farming, Inc., Raleigh, NC		
			FIFRA Endangered Species Task Force Washington, DC		
			The Hide Group, Inc. Sardis, MS		
			Agricultural Handlers Exposure Task Force, Macon, MO		
			Gro-Pro, LLC Gig Harbor, WA		
			U.S.A. Ag Chemicals, Inc. Washington, DC		
			Tacoma Ag, LLC Brookfield, CT		

Signature

Name and Title
James M Wagner
Agent for Willowood Mepiquat Chloride, LLC

Date
July 2, 2013



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.

WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instruction and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington DC 20460. Do not send the form to this address.

DATA MATRIX

Date: July 2, 2013	EPA Reg No./ File Symbol: 88781-1	Page 4 of 4
Applicant's/Registrant's Name and Address: Willowood Mepiquat Chloride, LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707	Product: Willowood Mepiquat Chloride Technical	
Ingredient: Mepiquat Chloride		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Agsaver, LLC Washington, DC		
			Generic Endangered Species Task Force, Gig Harbor, WA		

Footnotes: 1) Certification of Limits is provided in the Confidential Statement of Formula EPA form 8574-4

40

EPA Form 8570-35

Signature 	Name and Title James M Wagner Agent for Willowood Mepiquat Chloride, LLC	Date July 2, 2013
--	--	----------------------



March 13, 2013

Document Processing Desk (AMEND)
ATTN: Tony Kish, PM 22
Registration Division
U.S. Environmental Protection Agency
Office of Pesticide Programs (7504P)
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202-4501

Wagner Regulatory Associates, Inc.
P.O. Box 640
7217 Lancaster Pike, Suite A
Hockessin, Delaware 19707

Dear Mr. Kish,

Subject: Willowood Mepiquat Chloride Technical, EPA Reg. No. 88781-1

Wagner Regulatory Associates, Inc., as agent for Willowood Mepiquat Chloride, LLC, is requesting an amendment of the basic Confidential Statement of Formula of the above referenced product. This amendment involves a change of information in Boxes 2 and 11 of the form. No other changes have been made to the CSF. A copy of the last CSF accepted by EPA is enclosed for reference. The enclosed CSF is intended to supersede the EPA approved CSF dated October 17, 2011.

In support of this amendment, the following documents are enclosed:

- Letter from Willowood Mepiquat Chloride, LLC appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Registration (8570-1)
- Confidential Statement of Formula (8570-4), 2 copies
- Letter from Willowood Limited providing justification for this request
- A copy of the EPA approved CSF dated October 17, 2011

If you have any questions about this submission please contact the undersigned at cheryl@wagnerreg.com or (302) 635-7289.

Respectfully submitted,

Cheryl Wagner
Agent for Willowood Mepiquat Chloride, LLC

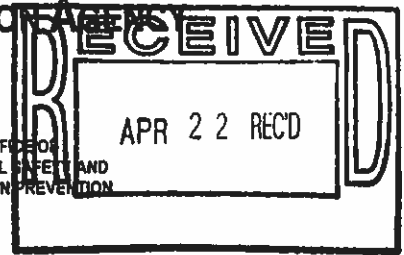
Enclosures





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION



APR 12 2013

Cheryl Wagner
Wagner Regulatory Associates, Inc.
P.O. Box 640
7217 Lancaster Pike, Suite A
Hockessin, Delaware 19707

Subject: Willowood Mepiquat Chloride Technical
EPA Reg. No. 88781-1
EPA Decision No. 476860
CSF amendment

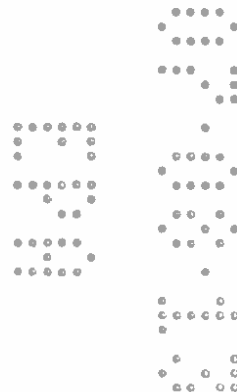
Dear Ms. Wagner

The basic Confidential Statement of Formula (CSF) dated 3/13/13 referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act as amended is not acceptable. The supporting data for the product does not reflect the location on the revised CSF in boxes 2 and 11. Please resubmit this CSF request as a PRIA application.

If you have any questions, please contact Shaunta Hill by phone at (703) 347-8961 or via email at hill.shaunta@epa.gov.

Sincerely,

Driss Benmhend
Acting Product Manager 20
Fungicide Branch
Registration Division (7504P)



Memorandum

Date: 07/15/13

To: PM 20, Regulatory Manager

From: Information Services Branch, ITRMD

Your receipt of this data submission is not an indication that MRIDs for the enclosed studies have been posted to OPPIN.

We expect that it will be approximately 5 days from the above date before the study-level data is available in OPPIN.

If you have any questions about this process, please contact Teresa Downs (305-5363).

This is a: ☒ fully accepted submission
☐ partially accepted submission
☐ rejected submission



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

July 15, 2013

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

WAGNER REGULATORY ASSOCIATES, INC
WILLOWOOD MEPIQUAT CHLORIDE, LLC
PO.BOX : 640
HOCKESSIN, DE 19707

Report of Analysis for Compliance with PR Notice 11-03

Thank you for your submittal of 08-JUL-13. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 11-03. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

Receipt for Section 3

S: 937978

Resubmission: ☐ Yes ☒ No

Regulatory Type: Product Registration - Section 3

Fee For Service: ☐ Yes ☒ No

Application Type: Amendment

Billable: ☒ Yes ☐ No

Company: 88781 WILLOWOOD MEPIQUAT CHLORIDE, LLC

V

Print Letter

Enter More Information

Tracking

Risk Manager: Registration Division, Risk Management Team 20

Product #: 88781-1 Product Name: WILLOWOOD MEPIQUAT CHLORIDE TECHNIC

Override#:

Me Too
Section3: 42750-73

Me Too
Product Name: TECHNICAL MEPIQUAT CHLORIDE

Application Date: 02-Jul-2013



OPP Rec'd Date: 08-Jul-2013



Front End Date: 08-Jul-2013



Risk Manager Send Date:



FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

Amendment to correctly identify the name of the product manufacturer

New Ingredient

Request Date:

New Ingredient

Received Date:

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

Receipt Content

Des

Study

CSF

View/Edit

Federal Express

July 3, 2013

Document Processing Desk (REGFEE)
ATTN: Acting PM 20, Fungicide Branch
Registration Division, US EPA
Office of Pesticide Programs (7504P)
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202-4501



Wagner Regulatory Associates, Inc.
P.O. Box 640
7217 Lancaster Pike, Suite A
Hockessin, Delaware 19707

Dear Sir or Madam,

Subject: Willowood Mepiquat Chloride Technical, EPA Reg. No. 88781-1

On behalf of Willowood Mepiquat Chloride, LLC, I am submitting the enclosed application to amend the registration of Willowood Mepiquat Chloride Technical, EPA Reg. No. 88781-1.

Background for this application is as follows.

1. In the original 5 batch report (MRID 48630802) for this product registration, it states that the samples were supplied by Willowood (Hangzhou) Co. Ltd. This company was shown in the CSF dated October 17, 2011 in box 2 as the 'producer'.
2. Subsequently, it became clear that while Willowood Co. Ltd. supplied the samples to the laboratory, Willowood had not manufactured the samples. Therefore we submitted a request on March 13, 2013 to amend the CSF dated October 17, 2011 to change the information in Boxes 2 and 11 of the form.
3. In response we received a letter dated April 12, 2013, from Mr. Benmhend which rejected the submission and asked that the request be resubmitted as a PRIA application. A copy of our letter of March 13th and Mr. Benmhend's letter of April 12th are enclosed.

Accordingly, I am now resubmitting a request to amend the CSF for this product to change the company name in boxes 2 and 11 of the form. No other changes, except for the date, have been made to the CSF. To support this request I am submitting an amended preliminary analysis (5 batch) report for this product. The performing laboratory has amended the original report to show the name and address of manufacturer of the test samples rather than the name and address of company supplying the samples. I am also submitting an amendment to the report of the manufacturing process (MRID No. 48630801) with the same change as the 5 batch report, i.e. the name and address of the manufacturer replaces the name and address of the supplier.

The only change to the preliminary analysis report is with regard to the manufacturer of the test substance, as shown on pages 6 and 89 of the amended report. There are no changes in the analytical data or any other information from the original report. Therefore the Agency's technical reviews (attached) dated 6/28/12 and 7/10/12 for the original report are unaffected by this report amendment and further technical review of the report data is unnecessary. We therefore believe that this action qualifies as PRIA category R340 and the fee for this category has been paid and receipt attached.

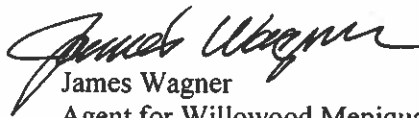
Page 2, July 3, 2013

To support of this amendment, the following documents are enclosed:

- Letter from Willowood Mepiquat Chloride, LLC appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Registration (8570-1)
- Confidential Statement of Formula (8570-4), 2 copies
- Data matrix, EPA form 8570-35
- Certification form 8570-34
- Receipt of payment of PRIA fee category R340
- WRA letter dated March 13, 2013
- EPA letter dated April 12, 2013
- A copy of the last EPA approved CSF dated October 17, 2011
- EPA product chemistry reviews for 88781-1, dated June 28 and July 10, 2012
- Supporting data (3 copies each)

If you have any questions about this submission please contact the undersigned at james@wagnerreg.com or (302) 635-7290.

Respectfully submitted,



James Wagner
Agent for Willowood Mepiquat Chloride, LLC

Enclosures

DATA TRANSMITTAL DOCUMENT

1. Name and Address of Submitter

Willowood Mepiquat Chloride, LLC
c/o Wagner Regulatory Associates
PO Box 640
Hockessin, DE 19707

2. Regulatory Action In Support Of Which This Package is Submitted

Application for Amendment to Registration
Willowood Mepiquat Chloride Technical
EPA Reg. No. 88781-1

3. Transmittal Date

July 3, 2013

4. List of Submitted Studies

49167501

Wagner Regulatory Associates, Inc. (2013) Amendment to MRID 48630801:
Willowood Mepiquat Chloride Technical- Description of Manufacturing Process. Non-
confidential portion 5 pages, Confidential portion 3 pages.

49167502

Skopec, Jana (2013) Amendment to MRID 48630802: Preliminary Analyses of Five
Representative Production Batches of Mepiquat Chloride Technical Grade Active
Ingredient (TGAI) to Determine Percent Mepiquat Chloride and to Quantity its
Associated Impurities. AgriFor Scientific Pty Ltd., North Ryde, Australia. Report
Number WW-035 (Amended). Non-confidential portion 5 pages, Confidential portion
93 pages.

Company Official and Contact:

James M Wagner, Authorized Agent
Name and Title


Signature

Telephone: (302) 635-7290



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

APR 12 2013

Cheryl Wagner
Wagner Regulatory Associates, Inc.
P.O. Box 640
7217 Lancaster Pike, Suite A
Hockessin, Delaware 19707

Subject: Willowood Mepiquat Chloride Technical
EPA Reg. No. 88781-1
EPA Decision No. 476860
CSF amendment

Dear Ms. Wagner

The basic Confidential Statement of Formula (CSF) dated 3/13/13 referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act as amended is not acceptable. The supporting data for the product does not reflect the location on the revised CSF in boxes 2 and 11. Please resubmit this CSF request as a PRIA application.

If you have any questions, please contact Shaunta Hill by phone at (703) 347-8961 or via email at hill.shaunta@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Driss Benmhend", is written over the typed name.

Driss Benmhend
Acting Product Manager 20
Fungicide Branch
Registration Division (7504P)



Wagner Regulatory Associates, Inc.
P.O. Box 640
7217 Lancaster Pike, Suite A
Hockessin, Delaware 19707

March 13, 2013

Document Processing Desk (AMEND)
ATTN: Tony Kish, PM 22
Registration Division
U.S. Environmental Protection Agency
Office of Pesticide Programs (7504P)
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202-4501

Dear Mr. Kish,

Subject: Willowood Mepiquat Chloride Technical, EPA Reg. No. 88781-1

Wagner Regulatory Associates, Inc., as agent for Willowood Mepiquat Chloride, LLC, is requesting an amendment of the basic Confidential Statement of Formula of the above referenced product. This amendment involves a change of information in Boxes 2 and 11 of the form. No other changes have been made to the CSF. A copy of the last CSF accepted by EPA is enclosed for reference. The enclosed CSF is intended to supersede the EPA approved CSF dated October 17, 2011.

In support of this amendment, the following documents are enclosed:

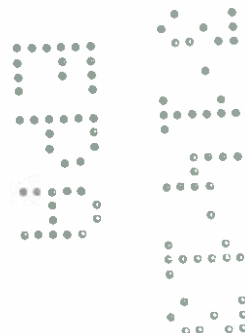
- Letter from Willowood Mepiquat Chloride, LLC appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Registration (8570-1)
- Confidential Statement of Formula (8570-4), 2 copies
- Letter from Willowood Limited providing justification for this request
- A copy of the EPA approved CSF dated October 17, 2011

If you have any questions about this submission please contact the undersigned at cheryl@wagnerreg.com or (302) 635-7289.

Respectfully submitted,

Cheryl Wagner
Agent for Willowood Mepiquat Chloride, LLC

Enclosures



Willowood Mepiquat Chloride, LLC

August 24, 2011

To: Whom it May Concern

Re: Designation of Agent for:
Willowood Mepiquat Chloride, LLC
1600 NW Garden Valley Blvd.
Suite 120
Roseburg, OR 97471

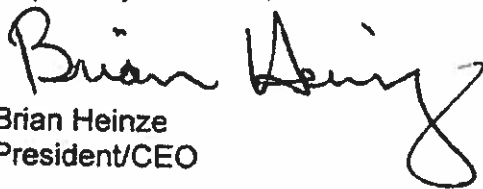
Dear Sir or Madam:

This letter serves as notification that Willowood Mepiquat Chloride, LLC has appointed Wagner Regulatory Associates, Inc. (WRA, Inc.) to serve as the Agent on our company's behalf regarding all state and federal regulatory matters relative to its Mepiquat Chloride products that Willowood Mepiquat Chloride, LLC will register with US EPA and the states. Please forward all correspondence for Willowood Mepiquat Chloride, LLC and its products to:

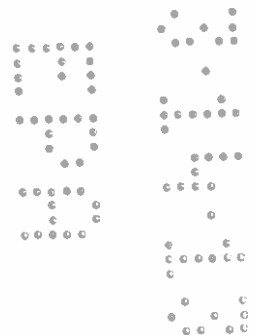
Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707-0640

Thank you for your time and assistance. Please feel free to call me at if you have any questions.

Respectfully submitted,


Brian Heinze
President/CEO

cc: WRA, Inc.



1600 NW Garden Valley Blvd., Suite 120 | Roseburg, Oregon 97471



United States
Environmental Protection Agency
 Washington, DC 20460

X

Registration

Amendment

Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 88781-1	2. EPA Product Manager Tony Kish	3. Proposed Classification <input checked="" type="checkbox"/> None Restricted
4. Company/Product (Name) Willowood Mepiquat Chloride, LLC/ Willowood Mepiquat Chloride Technical	PM# 22	
5. Name and Address of Applicant (Include Zip Code) Willowood Mepiquat Chloride, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name:

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Amendment updating producer and supplier of technical grade active ingredient

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) HDPE lined bags		
* Certification must be submitted If "Yes" No. per If "Yes" No. per Unit Packaging wgt. container Package wgt. container					
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 500 kg (1102 lbs.)		5. Location of Label Directions <input type="checkbox"/> On Label <input checked="" type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name Cheryl Wagner	Title Agent for Willowood Mepiquat Chloride, LLC	Telephone No. (Include Area Code) (302) 635-7289
-----------------------	---	---

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

 Date Application Received
 (Stamp)

2. Signature 	3. Title Agent for Willowood Mepiquat Chloride, LLC
4. Typed Name Cheryl Wagner	3/13/2013

FAST-TRACK AMENDMENTS – Completeness Screening Checklist

Expert's In-Processing Signature: Emily Hartman Date: 3-18-13 PM #: 20

EPA Reg. Number: <u>88781-1</u>		EPA Receipt Date: <u>3-14-13</u>		
	Checklist Item	Yes	No	N/A
1	Application Form (EPA Form 8570-1) - signed?	✓		
2	Confidential Statement of Formula (EPA Form 8570-29) - signed?	✓		
3	Certification with Respect to Citation of Data (EPA Form 8570-34) - signed?			✓
4	Formulator's Exemption Statement (EPA Form 8570-27) - signed?			✓
5	Data Matrix (EPA Form 8570-35) [Applicable for adding me-too uses] - signed?			✓
	a) Selective Method?			
	b) Cite-All Method?			
	c) Public copy of Matrix provided? See PR Notice 98-5			
6	Is Label included? (5 copies)			✓
	a) Electronic Label submitted?			
Comments: At face value, appears to be R351 PRIA action but is only change company name and address? (already been reviewed)				

Receipt for Section 3

S: 932407

Resubmission: ☐ Yes ☒ No

Regulatory Type: Product Registration - Section 3

Fee For Service: ☐ Yes ☒ No

Application Type: Amendment

Billable: ☐ Yes ☒ No

Company: 88781 WILLOWOOD MEPIQUAT CHLORIDE, LLC



Risk Manager: Registration Division, Risk Management Team 20

Product #: 88781-1 Product Name: WILLOWOOD MEPIQUAT CHLORIDE TECHNICAL

Override#:

Me Too
Section3: 42750-73

Me Too
Product Name: TECHNICAL MEPIQUAT CHLORIDE

Application Date: 13-Mar-2013



OPP Rec'd Date: 14-Mar-2013



Front End Date: 14-Mar-2013



Risk Manager Send Date: 15-Mar-2013



FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Receipt Content

CSF



Fast Track: ☐

New Ingredient: ☐

Receipt Description:

AMENDMENT

New Ingredient

Request Date:

New Ingredient

Received Date:

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

View/Edit



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

March 15, 2013

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

CATHERINE BYRD
WAGNER REGULATORY ASSOCIATES, INC
WILLOWOOD MEPIQUAT CHLORIDE, LLC
PO Box 640
HOCKESSIN, DE 19707-

PRODUCT NAME: WILLOWOOD MEPIQUAT CHLORIDE TECHNICAL
COMPANY NAME: WILLOWOOD MEPIQUAT CHLORIDE, LLC
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 88781-1
EPA RECEIPT DATE: 03/14/13

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 20, at (703) 305-7990.

Sincerely,

A handwritten signature in black ink, appearing to be "S. J. [unclear]".

Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

Fee for Service

{932407#~

This package includes the following

☐ New Registration

☒ Amendment

☐ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: ____

for Division

☐ AD

☐ BPPD

☒ RD

Risk Mgr. 20

Receipt No.

S-

932407

EPA File Symbol/Reg. No.

88781-1

Pin-Punch Date:

~~2/14/2013~~

3/14/13

☒ This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: \$ _____

Parent/Child Decisions:

☐ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: *S. F. G. L.*

Date: *3/15/13*

Remarks:



Wagner Regulatory Associates, Inc.
P.O. Box 640
7217 Lancaster Pike, Suite A
Hockessin, Delaware 19707

October 15, 2012

Document Processing Desk (REGFEE)
ATTN: Tony Kish, PM 22
Registration Division
U.S. Environmental Protection Agency
Office of Pesticide Programs (7504P)
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202-4501

Dear Mr. Kish:

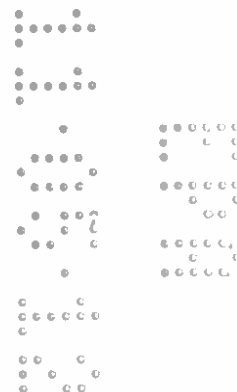
Re: Willowood Mepiquat Chloride Technical
EPA Registration Number 88781-1

Wagner Regulatory Associates, Inc., as agent for Willowood Mepiquat Chloride, LLC, respectfully submits the enclosed final print label in response to the Notice of Registration dated August 27, 2012.

Please contact me via email at cheryl@wagnerreg.com or telephone at (302) 635-7289 if you have any questions or require additional information.

Cheryl Wagner
Wagner Regulatory Associates, Inc.
Telephone: (302) 635-7289
Fax: (302) 635-7295

PLEASE NOTE NEW TELEPHONE AND FAX NUMBER!!



Willowood Mepiquat Chloride Technical

Formulating Use Only

Active Ingredient:

Mepiquat Chloride: N, N-dimethylpiperidinium chloride.....98.6%

Other Ingredients:1.4%

Total:100.0%

KEEP OUT OF REACH OF CHILDREN WARNING

FIRST AID

If swallowed

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

On skin or clothing

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

If inhaled

- Move person to fresh air
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.
- Call a poison control center or doctor for further treatment advice.

Have the product container or label with you when calling a poison control center, doctor, or going for treatment.

For emergency information concerning this product, call the National Pesticides Information Center (NPIC) at 1-800-858-7378 seven days a week, 6:30am to 4:30pm Pacific Time (NPIC Web site: www.npic.orst.edu).

EPA Reg. No. 88781-1

EPA Est. No. 88842-CHN-001

Net Contents: 55 pounds (25 kilograms)
1102 pounds (500 kilograms)

Manufactured for:

Willowood Mepiquat Chloride LLC
500 NW Garden Valley Blvd, Suite 120
Seaside, OR 97138

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS WARNING

May be fatal if swallowed. Harmful if absorbed through the skin or inhaled. Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing. Avoid breathing dust. Wash thoroughly with soap and warm water after handling and before eating, drinking, or using tobacco. Remove and wash contaminated clothing before reuse.

Environmental Hazards

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

Only for formulation into a plant growth regulator for use on cotton.

This product may be used to formulate products for any additional use(s) not listed on this label if the formulator, user group, or grower has complied with U.S. EPA data submission requirements regarding support of such use(s).

Each formulator using this product to formulate an end use pesticide product is responsible for obtaining an EPA registration for its end use product.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in a cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food, and feed. Store in original container and out of the reach of children, preferably in a locked storage area.

Pesticide Disposal: Pesticide wastes are toxic. Improper disposal of excess pesticide or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Container Handling:

(Bags): Nonrefillable container. Do not reuse or refill this container. Completely empty bag into application equipment. Then offer for recycling if available or reconditioning if appropriate or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

(Plastic) Nonrefillable container: Do not reuse or refill this container. Triple rinse (or equivalent). Then offer for recycling if available or reconditioning if appropriate or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

REFILLABLE CONTAINER: Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into formulation equipment. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

IMPORTANT: READ BEFORE USE

Read the entire Directions for Use, Conditions, Disclaimer of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once.

By using this product, user or buyer accepts the following Conditions, Disclaimer of Warranties and Limitations of Liability.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

CONDITIONS: The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Willowood Mepiquat Chloride LLC. To the extent consistent with applicable law, all such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, WILLOWOOD MEPIQUAT CHLORIDE LLC MAKES NO OTHER WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE, THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. To the extent consistent with applicable law, no agent of Willowood Mepiquat Chloride LLC is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, WILLOWOOD MEPIQUAT CHLORIDE LLC DISCLAIMS ANY LIABILITY WHATSOEVER FOR SPECIAL, INCIDENTAL OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

LIMITATIONS OF LIABILITY: TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER FOR ANY AND ALL LOSSES, INJURIES OR DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER IN CONTRACT, WARRANTY, TORT, NEGLIGENCE, STRICT LIABILITY OR OTHERWISE, SHALL NOT EXCEED THE PURCHASE PRICE PAID, OR AT WILLOWOOD MEPIQUAT CHLORIDE LLC'S ELECTION, THE REPLACEMENT OF PRODUCT.

NOT REVIEWED
In Accordance with PR Notice 82-2
Based on Draft Labeling Dated
8-27-12